

SUPPRESSED

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

AUG 20 2014

UNITED STATES OF AMERICA,

Plaintiff,

vs.

AYIKO L. PAULETTE,

a/k/a "Cuz," a/k/a "Jay,"

a/k/a "Joe," a/k/a "Wall,"

ALLEN J. HENRY,

a/k/a "June Bug,"

ROCHELLE M. COKER,

AKEELAN R. PAULETTE,

AKEELAN L.J. PAULETTE,

LAMONTRIC T. WAYNE,

RONALD W. ARTIS,

TATANISHA N. BANKS-FAIR,

JERRICA S. COLE, and

JEREMY J. LEWIS,

Defendants.

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

CRIMINAL NO. 14-30152-NJR

Title 21, United States Code,
Sections 841, 846, 856

Title 18, United States Code,
Sections 922, 924, 1952, 2

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

Conspiracy to Distribute Controlled Substances

From in or about January 2007 to in or about July 2014, in St. Clair County, Illinois,
within the Southern District of Illinois, and elsewhere,

AYIKO L. PAULETTE, a/k/a "Cuz," a/k/a "Jay," a/k/a "Joe," a/k/a "Wall,"

ALLEN J. HENRY, a/k/a "June Bug,"

ROCHELLE M. COKER,

AKEELAN R. PAULETTE,

AKEELAN L.J. PAULETTE,

LAMONTRIC T. WAYNE,

RONALD W. ARTIS,

TATANISHA N. BANKS-FAIR,

JERRICA COLE, and

JEREMY J. LEWIS,

defendants herein, did knowingly and intentionally combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with intent to distribute controlled substances, to wit: cocaine, a Schedule II Controlled Substance, methamphetamine, a Schedule II Controlled Substance, and heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

The amount of mixture or substance containing cocaine involved in this conspiracy, which was reasonably foreseeable to **AYIKO L. PAULETTE** and **ALLEN J. HENRY** was 5 kilograms or more.

The amount of mixture or substance containing cocaine involved in this conspiracy, which was reasonably foreseeable to **ROCHELLE M. COKER, AKEELAN R. PAULETTE, AKEELAN L.J. PAULETTE, LAMONTRIC T. WAYNE, RONALD M. ARTIS, TATANISHA N. BANKS-FAIR, JERRICA S. COLE,** and **JEREMY J. LEWIS** was 500 grams or more.

The amount of methamphetamine (actual) involved in this conspiracy, which was reasonably foreseeable to **AYIKO PAULETTE** was 50 grams or more.

COUNT 2

Maintaining Drug-Involved Premises

On or about March 18, 2013, in St. Clair County, Illinois, within the Southern District of Illinois,

AYIKO L. PAULETTE, a/k/a "Cuz," a/k/a "Jay," a/k/a "Joe," a/k/a "Wall,"

defendant herein, did knowingly use and maintain the residence at 2208 St. Clair Avenue, East St. Louis, Illinois, for the purpose of manufacturing, distributing, and using a controlled substance; all in violation of Title 21, United States Code, Section 856(a)(1).

COUNT 3

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

On or about March 18, 2013, in St. Clair County, Illinois, within the Southern District of Illinois,

AYIKO L. PAULETTE, a/k/a "Cuz," a/k/a "Jay," a/k/a "Joe," a/k/a "Wall,"

defendant herein, did knowingly possess a firearm, to wit: a Norinco, Model SKS, 7.62x39 caliber rifle, bearing serial number 1142955; a Romarm, Model GP WASR 10, 7.62x39 caliber rifle, bearing serial number AJ-1047-81; an Intratec, Model TEC-DC9, 9mm semiautomatic pistol, bearing serial number D072349; a Taurus, Model PT92AF, 9mm semiautomatic pistol, bearing serial number TIL12141; a Mossberg, Model 500 ATP, .12 gauge shotgun, bearing serial number H942073; and a Universal Arms Corp., Model M1, .30 caliber carbine rifle, bearing serial number 480073, in furtherance of a drug trafficking crime, to wit: Conspiracy to Distribute Controlled Substances, as charged in Count 1, and Maintaining Drug-Involved Premises, as Charged in Count 2; all in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 4

Felon in Possession of a Firearm

On or about March 18, 2013, in St. Clair County, Illinois, within the Southern District of Illinois,

AYIKO L. PAULETTE, a/k/a "Cuz," a/k/a "Jay," a/k/a "Joe," a/k/a "Wall,"

defendant herein, having previously been convicted on November 19, 2004 of a felony

punishable by a term of imprisonment exceeding one year, namely, Aggravated Fleeing Police, in Case No. 01-CF-1340 in St. Clair County, Illinois, did knowingly possess, in and affecting commerce, a firearm, to wit: a Norinco, Model SKS, 7.62x39 caliber rifle, bearing serial number 1142955; a Romarm, Model GP WASR 10, 7.62x39 caliber rifle, bearing serial number AJ-1047-81; an Intratec, Model TEC-DC9, 9mm semiautomatic pistol, bearing serial number D072349; a Taurus, Model PT92AF, 9mm semiautomatic pistol, bearing serial number TIL12141; a Mossberg, Model 500 ATP, .12 gauge shotgun, bearing serial number H942073; and a Universal Arms Corp., Model M1, .30 caliber carbine rifle, bearing serial number 480073; all in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 5

Distribution of Heroin

On or about February 14, 2014, in St. Clair County, Illinois, within the Southern District of Illinois,

ALLEN J. HENRY, a/k/a, "June Bug,"

defendant herein, did knowingly and intentionally distribute a mixture or substance containing heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C).

COUNT 6

Distribution of Heroin

On or about February 28, 2014, in St. Clair County, Illinois, within the Southern District of Illinois,

ALLEN J. HENRY, a/k/a, "June Bug,"

defendant herein, did knowingly and intentionally distribute a mixture or substance containing heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections

841(a)(1), 841(b)(1)(C).

COUNT 7

Distribution of Cocaine

On or about February 28, 2014, in St. Clair County, Illinois, within the Southern District of Illinois,

ALLEN J. HENRY, a/k/a, "June Bug,"

defendant herein, did knowingly and intentionally distribute a mixture or substance containing Cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C).

COUNT 8

Distribution of Cocaine

On or about April 11, 2014, in St. Clair County, Illinois, within the Southern District of Illinois,

ALLEN J. HENRY, a/k/a, "June Bug,"

defendant herein, did knowingly and intentionally distribute a mixture or substance containing cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C).

COUNT 9

Distribution of Cocaine

On or about May 7, 2014, in St. Clair County, Illinois, within the Southern District of Illinois,

AYIKO L. PAULETTE, a/k/a "Cuz," a/k/a "Jay," a/k/a "Joe," a/k/a "Wall,"

defendant herein, did knowingly and intentionally distribute a mixture or substance containing cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code,

Sections 841(a)(1), 841(b)(1)(C).

COUNT 10

Distribution of Cocaine

On or about May 14, 2014, in St. Clair County, Illinois, within the Southern District of Illinois,

AYIKO L. PAULETTE, a/k/a "Cuz," a/k/a "Jay," a/k/a "Joe," a/k/a "Wall,"

defendant herein, did knowingly and intentionally distribute a mixture or substance containing cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C).

COUNT 11

Interstate Travel in Support of Racketeering

From on or about July 5, 2014 to on or about July 8, 2014, in the Southern District of Illinois, Missouri, Texas, and elsewhere,

**ROCHELLE M. COKER,
AKEELAN R. PAULETTE,
AKEELAN L.J. PAULETTE,
LAMONTRIC T. WAYNE,
RONALD W. ARTIS,
TATANISHA N. BANKS-FAIR,
JERRICA S. COLE, and
JEREMY J. LEWIS,**

counseled, commanded, and induced by

AYIKO L. PAULETTE, a/k/a "Cuz," a/k/a "Jay," a/k/a "Joe," a/k/a "Wall,"

defendants herein, traveled in interstate commerce from the State of Illinois, through the State of Missouri, to the State of Texas, and back, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, namely, a business enterprise involving the distribution of cocaine, a controlled

substance, in violation of Title 21, United States Code, Section 841, and thereafter performed and attempted to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of such unlawful activity; all in violation of Title 18, United States Code, Sections 1952(a)(3) and 2.

Forfeiture Allegation

Upon conviction of the offense alleged in Count 1 of this indictment,

**AYIKO L. PAULETTE, a/k/a "Cuz," a/k/a "Jay," a/k/a "Joe," a/k/a "Wall,"
ALLEN J. HENRY, a/k/a "June Bug,"
ROCHELLE M. COKER,
AKEELAN R. PAULETTE,
AKEELAN L.J. PAULETTE,
LAMONTRIC T. WAYNE,
RONALD W. ARTIS,
TATANISHA N. BANKS-FAIR,
JERRICA COLE, and
JEREMY J. LEWIS,**

shall forfeit to the United States pursuant to 21 U.S.C. § 853(a), any property constituting, or derived from, any proceeds said defendant obtained, directly or indirectly, as the result of such violation and any property of the defendant used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said violation.

Forfeiture of Firearm Allegation

Upon Conviction of the offense alleged in Count 3 and 4 of this indictment,

AYIKO L. PAULETTE, a/k/a Cuz a/k/a "Jay," a/k/a "Joe," a/k/a "Wall,"

shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms involved in or used in any knowing violation of 18 U.S.C. § 924(c)(1)(A) or 18 U.S.C. § 922(g)(1), including, but not limited to, the following:

A Norinco, Model SKS, 7.62x39 caliber rifle, bearing serial number 1142955;

A Romarm, Model GP WASR 10, 7.62x39 caliber rifle, bearing serial number AJ-1047-

81;

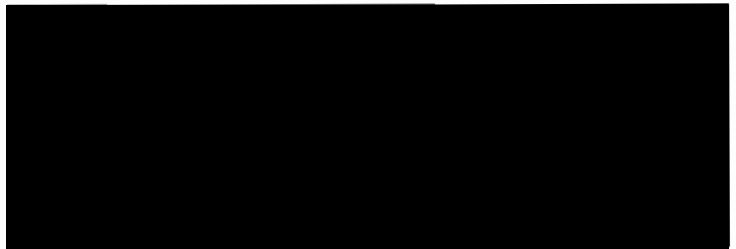
An Intratec, Model TEC-DC9, 9mm semiautomatic pistol, bearing serial number D072349;

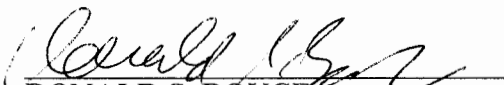
A Taurus, Model PT92AF, 9mm semiautomatic pistol, bearing serial number TIL12141;


A Mossberg, Model 500 ATP, .12 gauge shotgun, bearing serial number H942073; and

A Universal Arms Corp., Model M1, .30 caliber carbine rifle, bearing serial number 480073;

And any and all ammunition contained therein or seized therewith.




DONALD S. BOYCE
Assistant United States Attorney


STEPHEN R. WIGGINTON
United States Attorney

Recommended Bond: Detention for Ayiko L. Paulette and Allen J. Henry.
Release on conditions as to remaining defendants.